

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

CRIMINAL ACTION NO.: 04 – 10165RCL

UNITED STATES OF AMERICA

V.

TONY TEIXEIRA

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MOTION TO DISCHARGE SURETY

Now comes Pedro Teixeira, father of the defendant, and requests that the mortgage on his property be discharged.

On or about May 9, 2005 the United States of America secured a mortgage on the property of Pedro Teixeira, of 204 Green Street, Brockton, Plymouth County Massachusetts.¹

This mortgage, in the amount of Sixty Thousand Dollars (\$60,000.00) was to secure due observance, performance of the obligation, terms and conditions on the release of his son Tony Teixeira. (refer to document 50 Case 1:04-cr-10165-RCL filed 05/09/2005).

As of March 7 2007, (or thereabout), Tony Teixeira has been surrendered and begun serving his sentence.

¹ more particularly described: A deed from Barbara J. Saunders, formerly known as Barbara J. Johansen, a/k/a Barbara J. Gasse to Pedro Teixeira dated January 21, 1987 and recorded in the Plymouth County Registry of Deeds at Book 7439 Page 033.

Pedro Teixeira is in the process of refinancing his property and this outstanding mortgage prohibits him from going forward with a new loan. Mr. Teixeira respectfully requests that the court discharge the mortgage so that he may clear the title to his house.

A proposed Discharge is attached.

Respectfully submitted
For Pedro Teixeira
By his attorney

/s/ David P. Mullen
David P. Mullen, Esq.
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Assented to:

United States of America
By its Attorney

/s/ Timothy Feeley
Timothy Feeley
Assistant U.S. Attorney
1 Courthouse Way
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Boston, MA 02210

Tony Teixeira
By his Attorney

/s/ Francis Camera
Francis Camera
56 North Main St.
Suite 321
Fall River, MA 02720

CERTIFICATE OF SERVICE

I, David P. Mullen, do hereby certify that on this date I served the forgoing “**MOTION TODISCHARGE SURETY with ATTACHMENT**” upon all parties of record to this action by electronic filing.

Office of the US Attorney
1 Courthouse Way
Boston, MA 02115

Frank Dennis Camera
56 North Main St.
Suite 321
Fall River MA 02720

Dated: April 6, 2007

/s/ David P. Mullen
David P. Mullen